



# T. A. BLACKBURN LAW

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November 4, 2024

Honorable Eric N. Vitaliano, USDJ  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

~and~

Hon. James R. Cho, USMJ  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Jennifer Hough v. Petty AKA ("Zoo"); Case No. 1:21-cv-04568-ENV-JRC

Dear Judges Cho and Vitaliano:

We represent Plaintiff Jennifer Hough in the above-referenced matter. We respectfully submit this letter before the November 7, 2024, status conference to inform the Court that Plaintiff successfully deposed Steve Moisse on October 21, 2024. Plaintiff was scheduled to depose defendant Kenneth Petty on 10/28/2024 in compliance with the Court's October 8, 2024, Order. The morning of Mr. Petty's deposition, this writer, the court reporter, and Mr. Petty's counsel, Steven Isser, appeared approximately 10 minutes before the scheduled start time of 10 am.

We waited until 10:30 am, and Mr. Petty did not appear. Mr. Isser called him several times and indicated that he had spoken with Mr. Petty the evening prior and was certain he would appear. The deposition ended, and Mr. Isser emailed this writer later in the day, informing me that Mr. Petty alleged that his son was sick the night before the deposition. Unfortunately, Plaintiff bears the cost of the court reporter (\$250.00) and the time for counsel's appearance (\$1,000.00). Plaintiff



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respectfully requests that the Court issue an order for Defendant Petty to reimburse Plaintiff \$1,250.00.

The Plaintiff has provided Mr. Petty with an alternative deposition date of December 4, 2024. Unfortunately, November is pretty booked for this writer. After the Court appearance scheduled for 11/7/24 in this case, this writer will be heading to California until 11/11. Then, I have in-person court appearances, mediations, and Deposits on the 12, 13, and 14<sup>th</sup>. I will be in South America from 11/15 to 11/20. I will be between South Carolina, Georgia, and Florida from 11/21 to 11/30.

Finally, Plaintiff has retained Dr. Powers to provide an expert report on Plaintiff's psychological damages. Dr. Powers has begun her assessment. The Plaintiff is retaining a handwriting expert to support her position that Plaintiff did not sign the recent letter from 1994.

I would like to thank the Court for its time. I look forward to the status conference on 11/7/2024 at 10 am.

Respectfully Submitted,

*Tyrone A. Blackburn, Esq.*  
Tyrone A. Blackburn, Esq.

CC: All attorneys of record via ECF.



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